REMARKS

Claims 2 and 8 has been amended to correct minor typographical errors. Claims 1-15 and 17-25 remain pending in the application. Reconsideration is respectfully requested in light of the following remarks.

Section 103(a) Rejection:

The Office Action rejected claims 1-25 under 35 U.S.C. § 103(a) as being unpatentable over Rivera (U.S. Publication 2002/0107699) in view of Katz (U.S. Publication 2002/0174000). Applicants respectfully traverse this rejection for at least the reasons given below.

Regarding claim 1, Rivera in view of Katz fails to teach an applications content mapping module that is configured to <u>map the tags of a first data format to tags of a second data format</u> to determine data objects and attributes in a database corresponding to content in the second format. As admitted by the Examiner, Rivera does not teach this aspect of claim 1. The Examiner relies upon Katz to teach this functionality and cites the Abstract as well as numerous figures (2, 3A, 3B, 5, 7A, 7B and 7D) of Katz. However, the Abstract does not mention anything regarding a module configured to map tags of a first data format to tags of a second data format to determine data objects and attributes in a database corresponding to content in the second format. The Abstract of Katz only refers to generally integrating, analyzing, searching, extracting, transforming, and representing both internal and external data without describing any specific components or processes for performing these functions. Furthermore, none of the figures cited by the Examiner, nor any of the corresponding descriptions, teach a module configured to map tags of a one data format to tags of another data format as recited in Applicants' claim 1. Instead, Katz only refers to the use of customized transform modules that aggregate and normalize data to conform to the specific database schema in Katz' discovery database 192. Nowhere does Katz mention

the use of tags, nor does Katz provide any further details regarding the transformation and normalization process.

The Examiner also cites a passage (paragraph 180) where Katz describes how a "transformation has to be defined in the transform module for all data from each data source" (Katz, paragraph 180, lines 2-4). However, the cited passage does not refer to the mapping of tags either when defining transformations or when performing such transformations. Instead, Katz teaches that a transform module generates scripts that perform the actual transformations at run time.

The Examiner further cites paragraphs 246 and 247 of Katz as requiring "tagging." The Examiner is presumably asserting that the relevant limitations of claim 1, namely a module configured to map tags as described above, is inherent in Katz' teachings. The Examiner is clearly incorrect. The first cited passage describes "[m]atching an equivalent, standard qualified part or parts to an internal part number from a parts/supplier database" and the second cited paragraph describes "[m]atching a similar internal part of parts in the parts/supplier database to an external part number" (Katz, paragraph 246-247). However, the mapping of tags is clearly not inherent in the matching of parts to an internal part number from a parts database. Databases do not necessarily include, nor require, any sort of tags. Additionally, parts can be matched to part numbers in any number of way that do not include the mapping of tags from one data format to tags in another data format. For example, such matching of part numbers is frequently performed by comparing the text of part descriptions. There is nothing inherent in matching part numbers that requires mapping the tags of one data format to the tags of another data format as suggested by the Examiner. Furthermore, paragraphs 246 and 247 of Katz refer to data that Katz describes as "preferably stored in relational databases in datamart 74, organized for querying and report generation" (Katz, paragraph 85). Relational databases do not map of tags of one data format to tags of another data format. Thus, the Examiner fails to provide any evidence, other than his own conclusory hindsight-based statement, that the teachings of Katz' necessarily include an applications content mapping module configured to map the tags of a first data format to tags of a

second data format to determine data objects and attributes in a database corresponding to content in the second format, as recited in Applicants' claim 1.

Further in regard to claim 1, Rivera in view of Katz also fails to teach selectively retrieving one or more of the corresponding data objects and attributes according to a flag, wherein the flag indicates whether or not a corresponding data object or attribute is to be presented in the third format. This aspect of claim 1 in not taught by Rivera. The Examiner again relies upon Katz for teaching selectively retrieving data objects and attributes, again citing the Abstract and figures 2, 3A, 3B, 5, 7A, 7B and 7D of Katz. However, Katz, in the Abstract and cited figures, only refers to transforming and extracting data generally without teaching any specific method or process. The Examiner also cites paragraph 140-143 where Katz lists generating documents and output as actions generated by his VCI system. However, none of the cited paragraphs mention anything regarding the use of a flag when selectively retrieving data objects and attributes. The Examiner has also failed to provide any argument or to cite any portion of either Rivera or Katz that teaches wherein a flag indicates whether or not a corresponding data object or attribute is to be presented in the third format.

The Examiner additionally cites various other teachings of Katz that have nothing whatsoever to do with an applications content mapping module configured to map tags of one data format to tags of another data format, nor with selectively retrieving one or more of the corresponding data objects and attributes according to a flag, wherein the flag indicates whether or not a corresponding data object or attribute is to be presented in the third format, as recited in Applicants' claim 1. For example, the Examiner states that Katz teaches utilizing alerts according to customizable conditions and cites claims 18 and 19 of Katz. However, Applicants' claim 1 does not recite anything regarding utilizing alerts according to customizable conditions. Applicants fail to see the relevance of the Examiner's cited passages.

Furthermore, the Examiner has not provided a proper motivation for his proposed combination of Rivera and Katz. The Examiner contends that the motivation

to combine is "to teach an electronic purchasing system which integrates external and internal data required by companies to gain insights into business demands and requirements." However, this provides no motivation to combine the teachings of Rivera and Katz. In fact, the Examiner's motivation is merely a recitation of Katz' own motivation for his own Value Chain Intelligence (VCI) system. Thus, the Examiner's statement provides no motivation to use any system other than Katz's system. The Examiner has not provided any motivation that would lead one of ordinary skill in the art to combine the specific teachings cited of Katz with Rivera. Thus, the combination of Rivera and Katz is improper.

Even if the prior art did suggest to combine the teachings of Rivera and Katz, the resultant combination would not result in a system that included an applications content mapping module configured to map the tags of a first data format to tags of a second data format to determine data objects and attributes in a database corresponding to content in the second format, as recited in Applicants' claim 1. Nor would a combination of Rivera and Katz result in a system that included selectively retrieving one or more of the corresponding data objects and attributes according to a flag, wherein the flag indicates whether or not a corresponding data object or attribute is to be presented in a third format. Instead the combination of Rivera and Katz would only result in Rivera's purchase order translation process that also included the integration and normalization of data into relational databases as taught by Katz, no of which has anything to do with the above-noted aspects of claim 1.

Thus, the rejection of claim 1 is not supported by the cited art and removal thereof is respectfully requested. Similar remarks as made above regarding claim 1 also apply to independent claims 11, 17 and 23.

Regarding claim 2, Rivera in view of Katz fails to teach an applications content configuration module coupled to said applications content mapping module for providing specific markup language templates which, in combination with said electronic purchase requisition applications content, are translated into content suitable for presentation to a

particular purchasing requisitioner. The Examiner has rejected claim 2, citing the "detailed description" of Rivera without providing any detailed argument as to what portion of Rivera's teaching the Examiner equates to the applications content configuration module recited in Applicants' claim 2. However, Rivera fails to mention anything regarding providing specific markup language templates that are translated into content suitable for presentation to a particular purchasing requisitioner. Instead, Rivera discloses a translation module that uses format maps 200 to translate data between formats (Rivera, paragraphs 53-55). Rivera does not mention any mapping module that describes the format maps 200 has markup language templates and further fails to mention anything that can be considered an application content mapping module as recited in Applicants claim 2. Thus, the rejection of claim 2 is not supported by the cited art and removal thereof is respectfully requested.

In regard to claim 7, Rivera in view of Katz fails to teach wherein the applications content mapping module further comprises a two step mapping logic for automatically mapping index information of the first data format into the tag information of the second data format. The Examiner merely cites the entire detailed description of Rivera without pointing out any specific passage where Rivera actually describes automatically mapping index information of the first data format into tag information of the second data format. Rivera only teaches the use of "a database of format maps 200 that define the process for translating documents" (Rivera, paragraph 53). Rivera fails to disclose any two step mapping logic and further fails to mention anything regarding automatically mapping index information into tag information as recited in claim 7. Thus, the rejection of claim 7 is clearly based on the Examiner's own hindsight speculation regarding Rivera's system.

Regarding claim 8, the Examiner asserts that Rivera discloses wherein the applications content configuration module is an executable text file. Applicants respectfully disagree with the Examiner's interpretation of Rivera. The Examiner fails to cite any portion of Rivera and further fails to provide any explanation or line of reasoning illustrating how or where Rivera can be considered to teach wherein the applications

content configuration module is an executable text file. Rivera teaches the use of both client adapters and an integration module, none of which are described as executable text files. In fact, Rivera fails to mention anything about executable text files. Thus, the rejection of claim 8 is not supported by the prior art and removal thereof is respectfully requested.

The Examiner has failed to provide a proper rejection of claims 12-16, 18-22, and 24-25. The Examiner relies upon an earlier office action (dated March, 2, 2004) to provide the details of his rejections of these claims. However, the previous office action merely states, for claims 12-15 collectively, "the system and method as disclosed in the instant application is considered to be anticipated as readily apparent by the teachings of Rivera et al." Such a statement is improper under 37 CFR § 1.104(c)(2) which requires that to support a rejection "the particular part relied on <u>must</u> be designated as nearly as practicable." (emphasis added). Since the Examiner has not designated any particular part of the cited references to support his rejection, the rejection is improper.

Applicants also assert that numerous ones of the dependent claims recite further distinctions over the cited art. However, since the independent claims have been shown to be patentably distinct, a further discussion of the dependent claims is not necessary at this time.
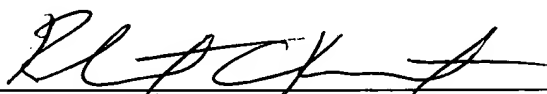
CONCLUSION

Applicants submit the application is in condition for allowance, and notice to that effect is respectfully requested.

If any extension of time (under 37 C.F.R. § 1.136) is necessary to prevent the above referenced application from becoming abandoned, Applicants hereby petition for such an extension. If any fees are due, the Commissioner is authorized to charge said fees to Meyertons, Hood, Kivlin, Kowert, & Goetzel, P.C. Deposit Account No. 501505/5681-90100/RCK.

Also enclosed herewith are the following items:

☒ Return Receipt Postcard

☐ Petition for Extension of Time

☐ Notice of Change of Address

☐ Fee Authorization Form authorizing a deposit account debit in the amount of $ for fees (   ).

☐ Other:

Respectfully submitted,

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